

Aaron L. Agenbroad (State Bar No. 242613)
alagenbroad@jonesday.com

JONES DAY
555 California Street, 26th Floor
San Francisco, CA 94104
Telephone: (415) 626-3939
Facsimile: (415) 875-5700

Attorneys for WASHINGTON GROUP
INTERNATIONAL, INC., A DIVISION OF URS
CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: KATRINA CANAL BREACHES
CONSOLIDATED LITIGATION**

PERTAINS TO: MRGO

**(PENDING IN THE UNITED STATES
DISTRICT COURT FOR THE EASTERN
DISTRICT OF LOUISIANA AS CIVIL
ACTION NO. 05-4182 "K" (2) BEFORE
HON. STANWOOD R. DUVAL, JR.),**

Defendant.

**Case No. MISC. NO. 08-CV-
80007MISC (PJH)**

**STIPULATION AND ~~PROPOSED~~
ORDER ADJUSTING
SUPPLEMENTAL BRIEFING
SCHEDULE**

Date: April 16, 2008
Time: 10:00 a.m.
Courtroom: G, 15th Floor
Judge: Hon. Bernard Zimmerman

WHEREAS, the Court has currently scheduled a hearing on the pending Discovery Motions (i.e. the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production; the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation; the February 14, 2008 MR-GO PSLC Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production; and the February 28, 2008 WGII Cross-Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge litigation) for April 16, 2008 at 10:00 a.m.;

WHEREAS, the Court issued an Order on March 5, 2008, requiring supplemental briefing

1 on the discovery motions pursuant to a schedule (i.e. the Plaintiffs, University and Professor Bea
2 to file a supplemental brief by March 21, 2008; Washington Group to file an opposition by March
3 31, 2008; any reply to be filed by April 7, 2008);

4 WHEREAS, the parties believe that they may be able to mutually resolve a majority, if
5 not all, of the disputed issues involved in the discovery motions in the near future;

6 WHEREAS, an adjustment to the deadlines for the parties respective supplemental briefs
7 may facilitate this mutual resolution;

8 WHEREAS, such an adjustment to the deadlines for the parties' briefs will not affect the
9 April 16, 2008 hearing date, but will provide the parties with an opportunity to either obviate the
10 need for that hearing or to substantially limit the number and/or scope of issues to be addressed at
11 that hearing;

12 IT IS HEREBY STIPULATED AND AGREED, subject to Court approval, that deadlines
13 for the parties' respective supplemental briefs are as follows:

- 14 • The Plaintiffs, University and Professor Bea's supplemental briefs must be filed by
15 March 26, 2008;
- 16 • Washington Group's opposition must be filed by April 2, 2008;
- 17 • Any reply brief must be filed by April 7, 2008

18 Dated: March 20, 2008

19 /s/ - Aaron L. Agenbroad
20 Aaron L. Agenbroad (State Bar No. 242613)
21 alagenbroad@jonesday.com
22 Jones Day
23 555 California Street
24 26th Floor
25 San Francisco, CA 94104-1500
26 Telephone: (415) 626-3939
27 Facsimile: (415) 875-5700

28 Attorneys for Washington Group
International, Inc., a division of URS
Corporation

1
2
3 Dated: March 20, 2008

/s/ Joseph C. Wilson

Joseph C. Wilson (State Bar No. 249027)
jwilson@cpmlegal.com
Cotchett, Pitre & McCarthy
San Francisco Airport Office Center
840 Malcom Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

7
8 Attorneys for MR-GO Plaintiffs' Sub-Group
Litigation Committee

9
10
11 Dated: March 20, 2008

/s/ - Christopher M. Patti

Christopher M. Patti
Christopher.Patti@ucop.edu
University of California
Office of the General Counsel
1111 Franklin Street, 8th Floor
Oakland, California 94607-5200
Telephone: (510) 987-9739
Facsimile: (510) 987-5757

16 Attorney for U.C. Berkeley and Professors
Reimer, Seed, Pestana and Bray

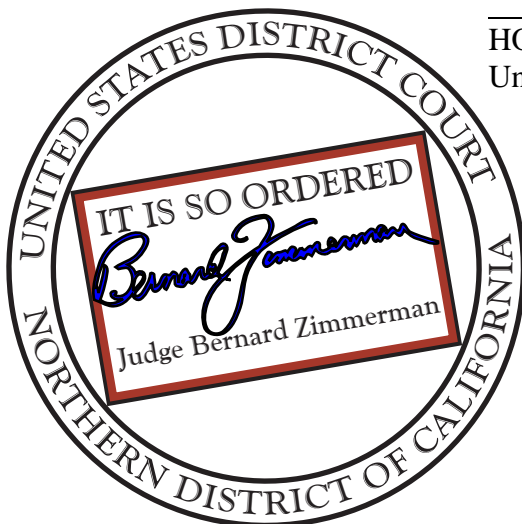
~~PROPOSED~~ ORDER


The Court, having considered the above stipulation of the parties, and good cause appearing, hereby ORDERS:

1. The deadlines for the parties supplemental briefs are as follows:
 - The Plaintiffs, University and Professor Bea's supplemental briefs must be filed by March 26, 2008;
 - Washington Group's opposition must be filed by April 2, 2008; and
 - Any reply brief must be filed by April 7, 2008.

IT IS SO ORDERED.

Dated: March 21, 2008




HON. BERNARD ZIMMERMAN
United States Magistrate Judge